

1 AARON D. FORD
Attorney General
2 CHARLES L. FINLAYSON (Bar No. 13685)
Senior Deputy Attorney General
3 State of Nevada
Office of the Attorney General
4 100 North Carson Street
Carson City, Nevada 89701-4717
5 Telephone: (775) 684-1115
Fax: (775) 684-1108
6 CFinlayson@ag.nv.gov
Attorney for Respondent
7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 HECTOR LEONARD JARDINE,
11 Petitioner,
12 vs.
13 BRIAN WILLIAMS, *et al.*,
14 Respondents.

Case No. 2:16-cv-02637-RFB-NJK

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME (FIRST
REQUEST)**

15 Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada,
16 hereby respectfully move this Court for an order granting a sixty (60) day enlargement of time, to and
17 including July 16, 2021, in which to file and serve their response to petition.

18 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure
19 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and
20 other materials on file herein.

21 There have been no prior requests for an enlargement of time, and this motion is made in good
22 faith and not for the purposes of delay.

23 RESPECTFULLY SUBMITTED this 17th day of May, 2021.

24 AARON D. FORD
Attorney General

25 By: /s/ Charles L. Finlayson
26 CHARLES L. FINLAYSON (Bar No. 13685)
27 Senior Deputy Attorney General
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DECLARATION OF COUNSEL

15 I, Charles L. Finlayson, hereby state, based on personal knowledge and/or information and
16 belief, that the assertions of this declaration are true:

17 1. I am a Senior Deputy Attorney General of the Post-Conviction Division of the Nevada
18 Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargement
19 of time.

20 2. My response in this matter is currently due on May 17, 2021. By this motion, I am
21 requesting a sixty (60) day enlargement of time, to and including July 16, 2021, in which to file my
22 response.

23 3. I require additional time to complete my response in this matter. I recently filed a reply
24 in support of a motion to dismiss and oppositions to motions for discovery and an evidentiary hearing in
25 *Mulder v. Gittere*, 3:09-cv-0610-JAD-WGC (death penalty), various responses in *Sonner v. Filson*, No.
26 17-99006 (death penalty), and an answering brief in *Kelsey v. Baker*, No. 19-16728. In addition, the
27 Ninth Circuit recently directed me to respond to an application to file a second or successive petition in
28 *Zakouto v. Russell*, 21-70375, and I require time to familiarize myself with that matter.

4. In addition to working on other matters, my role as a Senior Deputy Attorney General requires that I take time from my own cases to review and edit filings, conduct trainings, and coordinate responses with other departments. The Nevada Attorney General's Office also recently directed staff to take one day of furlough time per month, time which I cannot spend working on this matter.

5. I contacted counsel for the petitioner, Amelia Bizzaro, and they indicated that they have no objection to this request.

By: /s/ Charles L. Finlayson
CHARLES L. FINLAYSON (Bar No. 13685)

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
United States District Judge

DATED this 19th day of May, 2021.

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